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BEFORE THE ARIZONA CORPORATION COMMISSION

May 28 2 11 PM '99

JIM IRVIN

Commissioner – Chairman

DOCUMENT CONTROL

CARL J. KUNASEK

Commissioner

TONY WEST

Commissioner

IN THE MATTER OF THE COMPETITION IN) DOCKET NO. RE00000C-99-0205
THE PROVISION OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF ARIZONA) NOTICE OF FILING
)

City of Tucson hereby provides Notice of Filing Comments on the name of
document. The City expects to make additional comments at the public hearing
before the Commission.

DATED this 27th day of May, 1999.
David L. Deibel

Senior Assistant City Attorney
City of Tucson – City Attorney's Office
P.O. Box 27210
Tucson, AZ 85726-7210

Arizona Corporation Commission

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MAY 28 1999

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BEFORE THE ARIZONA CORPORATION COMMISSION

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CARL J. KUNASEK
Commissioner – Chairman

TONY WEST
Commissioner

JIM IRVIN
Commissioner

IN THE MATTER OF THE COMPLETION IN) DOCKET NO. RE-00000C-99-0205
THE PROVISION OF ELECTRIC SERVICES)
THROUGHOUT THE STATE OF ARIZONA) CITY OF TUCSON'S COMMENTS ON
THE ACC Staff Proposed Questions to be
outline issues to be discussed in this docket.

The City of Tucson (City) makes the following comments on the ACC Staff (Staff)
Proposed Questions to be used to outline the issues to be discussed regarding the
Generic Investigation of the Development of a Renewable Portfolio Standard as a
Portion of the Retail Electric Competition Rules:

The questions proposed by Staff are appropriate to begin the study of a renewable
portfolio standard. To fully discuss this issue, the City believes that the following
additions would assist the process:

Add "and why" to the end of the last questions contained in bullets #2 and #3.

Add the following questions to the Staff's proposed list:


- What are the relative costs of the portfolio standard versus stranded costs?
- What long-term benefits will the portfolio standard have on the State of Arizona and its residents? Specific items to be addressed include job creation, maintenance of energy dollars in the local economy, load diversification, and pollution prevention.

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- DATED this 27th day of May, 1999.


David L. Deibel
Senior Asst. City Attorney
City of Tucson – City Attorney's Office
P. O. Box 27210
Tucson AZ 85726-7210

AN ORIGINAL AND TEN COPIES
of the foregoing City of Tucson's
Comments on the Recommendations
Of the Hearing Officer Regarding
Electric Competition Rulemaking
Filed this 27th day of May, 1999, with:

Docket Control
Arizona Corporation Commission
1200 W. Washington
Phoenix AZ 85007

Copies of the foregoing mailed
This 27th day of May, 1999, to:

Service List for RE-00000C-94-0165

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